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OFFICIAL RECORD
HEALTH EFFECTS DIVISION
SCIENTIFIC DATA REVIEW
EPA SERIES 361

MEMORANDUM

11-MAY-2000

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SUBJECT: ID#KS000001. Section 24(c) Special Local Needs (SLN) Registration.
Imazapic Use for the Control of Johnsongrass on Conservation Reserve Program
(CRP) Lands. Chemical# 128943. DP Barcode D265325. Case# 061179.
Submission# S577780.

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TO: Jim Tompkins/James Stone, PM Team 25
Registration Division (7505C)

The State of Kansas has submitted a FIFRA Section 24(c) SLN Registration for the use of Plateau™ Herbicide (active ingredient imazapic) on CRP lands for the control of Johnsongrass in Kansas. Temporary tolerances for residues of imazapic [(±)-2-[4,5-dihydro-4-methyl-4-(1-methylethyl)-5-oxo-1H-imidazol-2-yl]-5-methyl-3-pyridinecarboxylic acid] and its metabolite [2-[4,5-dihydro-4-methyl-4-(1-methylethyl)-5-oxo-1H-imidazol-2-yl]-5-hydroxymethyl-3-pyridinecarboxylic acid] both free and conjugated, applied as the ammonium salt have been established (99NE0009) and are listed under 40 CFR §180.490 for the following commodities:

grass forage	30 ppm
grass hay	15 ppm
milk	0.10 ppm
fat*	0.10 ppm
meat*	0.10 ppm
meat byproducts (except kidney)*	0.10 ppm
kidney*	1.0 ppm

* Cattle, goats, hogs, horses, and sheep

In addition, there is a permanent tolerance of 0.1 ppm for peanut nutmeat listed under 40 CFR §180.490.

This Section 24(c) for use of imazapic on CRP lands to control Johnsongrass proposes a maximum use rate of 8 - 10 oz Plateau™ Herbicide (0.12 - 0.15 lb acid equivalents (ae)/A). RD has requested that HED determine whether the proposed SLN use of Plateau™ Herbicide on CRP lands for the control of Johnsongrass constitutes a food use which requires establishment of permanent tolerances.

The submission includes proposed supplemental labeling along with a letter from the Kansas Department of Agriculture providing justification for this SLN Registration and an overview of the label restrictions designed to ensure the safety of this application.

Conclusion

HED has no objection to the issuance of a Section 24(c) registration for Plateau™ Herbicide use on CRP lands for the control of Johnsongrass in the State of Kansas. The proposed use rate in Kansas is supported by residue data previously submitted in support of the Section 18 actions approved for Nebraska and South Dakota. Because the expiration date on the SLN label corresponds to the expiration date of the time-limited tolerances for imazapic residues in/on grass forage and hay, permanent tolerances are not required to support this Section 24(c) registration at this time.

Detailed Considerations

HED considers the proposed SLN use of Plateau™ Herbicide on CRP lands for the control of Johnsongrass to be a food use as livestock may graze on treated areas. However, because the proposed SLN label has an expiration date of 31-DEC-2001, which corresponds to the expiration date of the Section 18 time-limited tolerances for imazapic residues in/on grass forage and hay in Nebraska and South Dakota, permanent tolerances are not required at this time.

The following restrictions appear on the supplemental labeling for this SLN registration:

- 1) DO NOT allow livestock to graze treated area for seven (7) days after treatment with PLATEAU herbicide.
- 2) DO NOT cut treated forage for hay for seven (7) days after treatment with PLATEAU herbicide.

HED does not consider grazing restrictions to be practical. Because the tolerance level for grass

forage was based on residue data for grass forage sampled at a PHI of 0 days, there is no need for a grazing restriction. Hence, the first restriction listed above may be omitted. As the tolerance level for grass hay was based on residue data for grass hay sampled at a PHI of 7 days, second restriction is appropriate.

The present SLN label specifies a use rate of 8 to 10 oz of Plateau™ Herbicide per acre (0.12 - 0.15 lb ae/A) plus a spray adjuvant, for use on CRP lands. The current Section 18 label restricts imazapic use rates on CRP lands to 4 oz per acre (0.06 lb ae/A) per year. However, the Section 18 label allows a use rate of up to 12 oz per acre (0.1875 lb ae/A) per year on roadsides and other noncrop areas, and the residue data used to set the time-limited tolerances on grass forage and hay were based on a use rate of 0.20 lb ae/A. Because the proposed use rate is covered by available residue data, HED has no objection to the proposed 24(c).

cc: W. Donovan, O. Odiott

RDf: RAB1 Chemists (11-MAY-2000), G. Kramer (11-MAY-2000), M. Morrow (11-MAY-2000)

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